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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) Case No. CR 12-0420 EMC
Plaintiff,)
v.)
KARIM ISKANDER BAYYOUK,)
Defendant.)
) STIPULATION AND [PROPOSED]
) PROTECTIVE ORDER

STIPULATION

The United States and the defendant in this action, through undersigned counsel, hereby stipulate and agree as follows:

1. The United States is prepared to produce to the defendant witness statements and reports governed by 18 U.S.C. § 3500, including grand jury testimony, and other grand-jury matters in advance of trial.

**STIPULATION & [PROPOSED] ORDER
CR 12-0420 EMC**

2. Federal Rule of Criminal Procedure 6(e)(3)(E) provides that the Court “may authorize disclosure – at a time, in a manner, and subject to any other conditions that it directs – of a grand-jury matter: (i) preliminary to or in connection with a judicial proceeding.” The parties request that the Court issue an order authorizing such disclosure.

6 3. Possession of copies of the witness statements and reports shall be limited to the
7 defendant and his attorneys, including any investigators, paralegals, law clerks, assistants, and other
8 persons who are within the attorney-client privilege (hereinafter collectively referred to as “members of
9 the defense team”). The defendant, his attorneys, and members of his defense team shall use the witness
10 statements and reports only for the purpose of defending against the allegations in the Indictment. The
11 defendant, his attorneys, and members of his defense team shall not provide copies of the witness
12 statements and reports to other persons.

4. At the conclusion of this proceeding, the defendant, his attorneys, and members of his defense team shall return to the government all copies of the witness statements and reports.

STIPULATED AND AGREED TO:

DATED: June 11, 2013

MELINDA HAAG
United States Attorney

/s/
ADAM A. REEVES
ROBERT S. LEACH
Assistant United States Attorneys

DATED: June 11, 2013

LAW OFFICES OF BRIAN H. GETZ

/s/
BRIAN H. GETZ, ESQ.
Counsel for Defendant
Karim Iskander Bayyouk

ORDER

In light of the stipulation and agreement of the parties to this action, and good cause appearing, it is HEREBY ORDERED that the United States is authorized to disclose grand-jury matters to the defendant, including the grand jury testimony of witnesses intended to be called at the trial. It is FURTHER ORDERED that use of any witness statements and reports produced by the United States shall be restricted as set forth in Paragraphs 3 through 4 above.

July 2, 2013

Dated: _____

